

Exhibit L

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF PONTIAC GENERAL EMPLOYEES'
RETIREMENT SYSTEM, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

- v -

LOCKHEED MARTIN CORPORATION, et al.,

Defendants.
-----X

No. 11 Civ. 5026 (JSR)(RLE)

ECF CASE

AFFIDAVIT OF
CATHERINE L. LERCHE

Catherine L. Lerche, being duly sworn, says:

1. My name is Catherine L. Lerche. I am currently employed as an HR Director at Lockheed Martin Corporation ("Lockheed Martin"). Based on my personal knowledge and a review of the files maintained by Lockheed Martin, I state that the following information is true and correct.

2. In March 2009, Information Systems & Global Services ("IS&GS") was comprised of six product lines: Civil, Intelligence, Defense, Readiness & Stability Operations ("RSO"), Global, and the Enterprise Integration Group ("EIG"). Each product line was led by a president, who was a direct report to the IS&GS Executive Vice President, Linda Gooden. Kenneth Asbury was the President of the Civil Product Line.

3. Reporting to each product line president were vice presidents of ten separate lines of business as well as a product line staff including vice presidents of functional organizations such as human resources, business development and finance and business operations. The product line functional staff shared responsibility for supporting multiple lines of business, as well as the thousands of programs or contracts within the lines of business.

4. William Parsons was a direct report to Mr. Asbury on the Civil Product Line staff as the Vice President of Strategic Space Initiatives. Margaret "Peggy" Burns was also a direct report to Mr. Asbury as the Vice President of the Information Systems and Knowledge Solutions ("IKS") line of business.

5. Each one of the ten lines of business was responsible for hundreds of separate programs or contracts for which individual program managers were responsible. The program managers reported either to directors responsible for separate organizations within the line of business (who reported to the line of business vice president) or directly to the line of business vice president.

6. Pamela Hawn was a senior manager in business operations working on the Integrated Hiring Operations and Personnel ("IHOP") program (later known as HR Access). Ms. Hawn was a direct report to the Director, Business Operations, David Valore. Mr. Valore


reported to Ms. Burns, Vice President of the IKS line of business. Ms. Hawn also had a "dotted line" reporting relationship to the director of the Justice and Intelligence Programs within IKS within the Civil Product Line.

7. Victor Morrison was a member of the program management office responsible for the Federal Trade Commission ("FTC") Do-Not-Call Program. Mr. Morrison's responsibilities related solely to the FTC Do-Not-Call Program and he was a direct report to the Program Director, Thomas Martwinski. Mr. Martwinski reported to Richard Rosenthal, who was the Vice President of the Business Transformation Solutions organization. Mr. Rosenthal reported to Darrell Graddy, who was the Vice President of the Process Solutions line of business within the Civil Product Line.

8. Ms. Hawn and Mr. Morrison were one of thousands of employees in equivalent positions throughout the IS&GS organization.

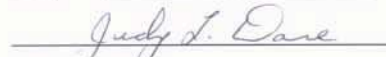
9. Attached as Exhibit 1 is an organization chart depicting the confidential witnesses' reporting relationships.

Dated: October 15th, 2012


[Catherine L. Lerche]

Sworn to before me this 15th

Day of OCTOBER, 2012.


Notary Public



IS&GS Civil Product Line as of March 25, 2009

Representative demonstrative only. The chart does not contain every position within the Civil product line.

